

AARON D. FORD
Attorney General
Katrina A. Lopez (Bar. No. 13394)
Deputy Attorney General
State of Nevada
Office of the Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, NV 89101
(702) 486-3770 (phone)
(702) 486-2377 (fax)
KSamuels@ag.nv.gov
Attorneys for Respondents

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHRISTOPHER RYAN MARTIN,

Petitioner,

v.

TOM LAWSON, *et al.*,

Respondents.

Case No. 2:22-cv-00850-APG-VCF

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
RESPONSE TO PETITION FOR WRIT OF
HABEAS CORPUS
(ECF NO. 1)

(FIRST REQUEST)**

Respondents move this Court for an enlargement of time of 45 days from the current due date of September 6, 2022, up to and including October 21, 2022, in which to file their Response to Martin's Petition for Writ of Habeas Corpus (ECF No. 1). This Motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

This is the first enlargement of time sought by Respondents and is brought in good faith and not for the purpose of delay.

DATED September 6, 2022

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Katrina A. Lopez
Katrina A. Lopez (Bar No. 13394)
Deputy Attorney General

DECLARATION OF KATRINA A. LOPEZ

I, Katrina A. Lopez, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Christopher Ryan Martin v. Tom Lawson, et al.*, Case No. 2:22-cv-00850-APG-VCF, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The Response to Martin's Petition is currently due on Tuesday, September 6, 2022.

4. Respondents have been unable with due diligence to timely complete the Response.

5. In the past few months, Respondents filed a reply in support of motion to dismiss filed June 20, 2022 (*Christopher Lenard Blockson v. Jerry Howell, et al.*, Case No. 2:21-cv-00731-GMN-VCF); supplemental briefing in the Ninth Circuit filed June 29, 2022 (*Darrell Conners v. William Hutchings, Warden; Attorney General for the State of Nevada*, Case No. 21-15693); a motion to dismiss filed July 7, 2022 (*Kwame Anir Saafir v. City of Las Vegas, et al.*, Case No. 2:21-cv-01832-JAD-VCF); an answering brief in the Ninth Circuit filed July 25, 2022 (*John Vernon Fields v. Renee Baker, Warden and Attorney General for the State of Nevada*, Case No. 20-17342); an answer filed July 28, 2022 (*Carlos Gonzalez-Rojas v. Calvin Johnson*, Case No. 2:21-cv-01652-APG-DJA); a reply in support of motion to dismiss filed August 15, 2022 (*Allen S. Heusner v. Dwight Neven, et al.*, Case No. 2:14-cv-01119-RFB-GWF); a reply in support of motion to dismiss filed August 16, 2022 (*Cory O'Neal Brewer v. William Gittere, et al.*, Case No. 3:20-cv-00396-MMD-CLB); a reply in support of motion to dismiss filed August 17, 2022 (*Kwame Anir Saafir v. City of Las Vegas, et al.*, Case No. 2:21-cv-01832-JAD-VCF); a response to motion for reconsideration filed August 22, 2022 (*Ricardo Quintanilla v. Brian Williams, et al.*, Case No. 2:20-cv-00211-GMN-NJK); a motion to dismiss filed September 1, 2022 (*Corry Alexis Hawkins v. Calvin Johnson, et al.*, Case No. 2:20-cv-01852-CDS-VCF); and various responses in state post-conviction cases.

6. Respondents communicated with counsel for Martin regarding this extension and they do not object to this request.

///

